

Exhibit 1-A

Assorgi Proof of Claim (Claim No. 2580)

UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK Claim #2580 Date Filed: 11/8/2012

Name of Debtor and Case Number: Residential Capital, LLC, Case No. 12-12020

NOTE: This form should not be used to make a claim for an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) arising after the commencement of the case. A "request" for payment of an administrative expense (other than a claim asserted under 11 U.S.C. § 503(b)(9)) may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (the person or other entity to whom the debtor owes money or property): Ruth Asorgi and Putative Class members

Name and address where notices should be sent: Heather Boone McKeever MCKEEVER LAW OFFICES PLLC P.O. Box 1181 Isle of Palms, SC 29451

Telephone number: 843-323-1174 email: Court Claim Number: (If known) Filed on: Check this box if this claim amends a previously filed claim. Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.

Name and address where payment should be sent (if different from above): foreclosurefraud@insightbb.com

Telephone number: email: 5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount. 1. Amount of Claim as of Date Case Filed: \$ 5,000,000.00+ If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.

2. Basis for Claim: SC Class Action GMAC Fraud/Forgery (See instruction #2)

3. Last four digits of any number by which creditor identifies debtor: 3a. Debtor may have scheduled account as: Asorgi v. GMAC (See instruction #3a) 3b. Uniform Claim Identifier (optional): South Carolina Class Action (See instruction #3b)

4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: Real Estate Motor Vehicle Other Describe: Value of Property: \$ Annual Interest Rate % Fixed Variable (when case was filed) Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ Basis for perfection: Amount of Secured Claim: \$ Amount Unsecured: \$

6. Claim Pursuant to 11 U.S.C. § 503(b)(9): Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before May 14, 2012, the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ (See instruction #6)

7. Credits. The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #7)

8. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. (See instruction #8, and the definition of "redacted".) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:

9. Signature: (See instruction #9) Check the appropriate box. I am the creditor. I am the creditor's authorized agent. (Attach copy of power of attorney, if any.) I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.) I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief. Heather McKeever Attorney MCKEEVER LAW OFFICE (Signature) (Date) 11-7-12

Address and telephone number (if different from notice address above): KURTZMAN CARSON CONSULTANTS

Telephone number: Email:



**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Case No. 12-12020-mg

RESIDENTIAL CAPITAL, LLC, et al., Chapter 11

Debtors. Joint Administration Pending

**STATEMENT OF HEATHER BOONE MCKEEVER, ESQ. IN SUPPORT OF THE
MOTION FOR OFFICIAL BORROWER COMMITTEE AND APPOINTMENT AS A
MEMBER OF THE COMMITTEE.**

Comes undersigned counsel and files her Statement in Support of the Motion for the Official Borrower Committee, based on the following:

1. I am a regular practicing attorney who litigates exclusively in the area of lender liability and mortgage fraud.

2. I have the full permission and support on behalf of my clients to participate in this Motion and their support for my firm to serve as a potential creditor committee member on behalf of borrowers.

3. I am currently counsel for the Plaintiffs in multiple class and consolidated actions against GMAC Mortgage LLC, Residential Capital LLC, and other Petitioners to the above-referenced Chapter 11. The cases as of this date include the following:

A. *Allorgi v. GMAC Mortgage LLC. and MERS* Class action for securitization fraud and forgery and slander of title. Original lender liquidated in bankruptcy. Beaufort County, South Carolina Court of Common Pleas. Robo signers are employees and the actual attorneys representing GMAC.

Potential damages 100+ million.

B. *Moody v. Deutsche Bank, GMAC Mortgage LLC, RALI and MERS*. Class action for violation of Kentucky's recording statutes, securitization and document fraud; including the 2012, newly invented, "Corrected Assignment of Mortgage. LPS/docx robo signers.

Fayette County Kentucky, Circuit Court.

Potential damages 100+ million.

C. *Foster v. GMAC, RESCAP, RALI, MERS, et al.* Nationwide class action, securitization and document fraud. Civil conspiracy, RICO claims. Lead Plaintiffs with claims against GMAC's "star" robo signer, Jeffry Stephan.

United States District Court for the Western District of Kentucky.

Potential damages 100+ million.

D. *Haffey v. GMAC Mortgage LLC, RALI, RESCAP, Deutsche Bank, MERS*. Consolidated cases involving securitization, and document fraud, challenging the legitimacy of MERS recorded mortgages in the state of Kentucky, the application of UCC Article 3, (negotiability) to GMAC/Deutsche presented Promissory Notes and fraud in relation to the Petitioners participation as a Plaintiff to any foreclosure in the state of Kentucky. Expert witness, Hon. Lynn Szymoniak's testimony is part of the file for the ongoing Justice Department investigation. Robo signer, GMAC's Pat Kelleher.

United States District Court for the Eastern District of Kentucky.

6th Circuit Court of Appeals. (cases currently held in abeyance.)

Potential damages 5+ million, plus a Declaratory Judgment that all MERS mortgages are void in the state of Kentucky, that GMAC as a servicer will never have standing

to foreclose in the state of Kentucky and tax fraud in relation to GMAC/Deutsche MBS classification as a REMIC.

4. The cases also contain claims against the Debtor(s) in their capacity as a shareholder in Mortgage Electronic Registration Systems, Inc. (MERS.)

5. The class action claims also name as a Defendant, the entity Deutsche Bank, as the alleged Trustee of various Mortgage Backed Securities. In all cases involving Deutsche Bank, at least one of the Debtor(s) served as either a Mortgage Servicer, or was in privity with Deutsche.

6. In the cases aforementioned, there are causes of action against the Debtor(s) and Deutsche Bank for securities fraud in relation to their joint activities as IRS classified REMICs.

7. As potential creditors of the Petitioners, and due to the nature of the Petitioners and other co-Defendants contractual agreements, there is an inherent conflict between the Petitioners and Deutsche Bank, MERS and other co-defendants/petitioner creditors to the class actions

8. In the cases aforementioned, there is a cause of action against the Debtor(s) and co-defendants for common law and statutory fraud, forgery and civil conspiracy to commit fraud.

9. In the cases aforementioned, employees and agents of the Debtors have been sued or will be named as Defendants in their corporate and individual capacities for fraud and forgery. The agents include, but are not limited to individuals who drafted, executed and notarized mortgage and foreclosure documents on behalf of the Debtors, GMAC executives who participated and condoned the practices, and the attorneys and law firms

who acted in concert with the Debtor(s) to commit fraud, forgery and commit fraud on the Courts.

10. The law firms and potential GMAC co-defendants in question, include the Petitioners national counsel and its registered lobbying firm, Bradley, Arant, Boult, Cummings, based in Birmingham, Alabama.

11. As of the date of this Affidavit, Bradley Arant, Boult Cummings has failed to notify the Court or file a Notice of Automatic stay in the cases for which it is involved with the undersigned.

12. There is a conflict of interest for Bradley Arant Boult Cummings and the foreclosure mills currently representing the debtors in relation to the cases and in any Court wherein they are potential co-defendants of the Debtor(s).

13. There is an ongoing whistle blower *Qui Tam* fraud case against the Debtor(s) by the Justice Department in the states of South and North Carolina, United States ex rel. Szymoniak v. GMAC/RESCAP, (USDC.S.C.) and United States ex rel. Szymoniak v. GMAC/RESCAP, (USDC.W.D.N.C.)

14. The above-referenced, *Qui Tam* relator, Hon. Lynn Szymoniak serves as the Plaintiffs' document fraud Expert Witness in the class actions and consolidated cases.

15. In April 2012, undersigned counsel was interviewed and met in person, with the United States Attorney, in Charleston, South Carolina who is prosecuting the Szymoniak case. The meeting was called in relation to the evidence and the prosecution of the *Qui Tam* case against the Debtor(s) and a separate second potential action against the law firms representing the debtor(s) and the other *Qui Tam* Defendants.

16. The Affidavits of Hon. Lynn Szymoniak offered in the cases, evidencing the Debtors, their agents and their attorneys' participation in document fraud and forgery, are in the possession of the United States Attorney and upon information and belief are evidence in the Justice Departments *Qui Tam* prosecution against the Debtor(s).

17. Base on the foregoing, I request on behalf of my clients, myself, and my firm, that the Court appoint an Official Borrower Committee and that the Trustee and the Court approve appointment of undersigned Plaintiffs' counsel as a member of the Committee.

18. Further, I sayeth not.

Dated: June 21, 2012

Respectfully submitted,

/s/ Heather Boone McKeever

Heather Boone McKeever

MCKEEVER LAW OFFICES PLLC

P.O. Box 1181

Isle of Palms, South Carolina 29451

(843) 323-1174

foreclosurefraud@insightbb.com

ATTORNEY FOR NAMED CLASS
ACTION PLAINTIFFS
AND THE CLASS MEMBERS